

**To:** Housenger, Jack[Housenger.Jack@epa.gov]; Keigwin, Richard[Keigwin.Richard@epa.gov]; Vogel, Dana[Vogel.Dana@epa.gov]; Doherty, Michael[Doherty.Michael@epa.gov]  
**From:** Miller, David  
**Sent:** Tue 12/13/2016 1:11:20 PM  
**Subject:** FW: Request for comments - CCPR eWG on IESTI:  
IESTI talking points 12 18 16.docx

See attached for more CLA/CLI stuff, received yesterday. These are their talking points. Note that with Glyphosate on today, it will be understandable for you not to get to this.

## Ex. 5 - Deliberative Process

David.

**From:** Cheryl Cleveland [mailto:cheryl.cleveland@basf.com]  
**Sent:** Monday, December 12, 2016 5:10 PM  
**To:** Miller, David <Miller.DavidJ@epa.gov>  
**Cc:** Jane M Stewart <jane.stewart@basf.com>; jcranney@calcitrusquality.org; diana.haynes@ams.usda.gov; John.Johnston@fsis.usda.gov; Angela.S.Klemens@dupont.com; vincent.a.leopold@monsanto.com; kent.rupprecht@bayer.com; allen.scarborough@bayer.com; Jane M Stewart <jane.stewart@basf.com>; Bruce Young <bruce.young@bayer.com>; Bacon, Laura <Bacon.Laura@epa.gov>; Maratos, Marie - FSIS <Marie.Maratos@fsis.usda.gov>; Pat.Basu@fsis.usda.gov  
**Subject:** RE: Request for comments - CCPR eWG on IESTI:

I am also sharing our two page document as well

Regards,

**Cheryl Cleveland, Ph. D.**  
Global Consumer Safety

Phone: +1 919 547-2407, Mobile: +1-919-593-0194, Email: [cheryl.cleveland@basf.com](mailto:cheryl.cleveland@basf.com)

Postal Address: BASF Corporation, 26 Davis Drive, 27709-3528 Research Triangle Park, United States



**From:** Cheryl Cleveland  
**Sent:** Monday, December 12, 2016 4:20 PM  
**To:** 'David Miller ([miller.davidj@epa.gov](mailto:miller.davidj@epa.gov))' <[miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)>  
**Cc:** Jane M Stewart <[jane.stewart@basf.com](mailto:jane.stewart@basf.com)>; jcranney@calcitrusquality.org' <[jcranney@calcitrusquality.org](mailto:jcranney@calcitrusquality.org)>; 'diana.haynes@ams.usda.gov' <[diana.haynes@ams.usda.gov](mailto:diana.haynes@ams.usda.gov)>; 'John.Johnston@fsis.usda.gov' <[John.Johnston@fsis.usda.gov](mailto:John.Johnston@fsis.usda.gov)>; 'Angela.S.Klemens@dupont.com' <[Angela.S.Klemens@dupont.com](mailto:Angela.S.Klemens@dupont.com)>; 'vincent.a.leopold@monsanto.com' <[vincent.a.leopold@monsanto.com](mailto:vincent.a.leopold@monsanto.com)>; 'kent.rupprecht@bayer.com' <[kent.rupprecht@bayer.com](mailto:kent.rupprecht@bayer.com)>; 'allen.scarborough@bayer.com' <[allen.scarborough@bayer.com](mailto:allen.scarborough@bayer.com)>; Jane M Stewart <[jane.stewart@basf.com](mailto:jane.stewart@basf.com)>; 'Bruce Young'

<bruce.young@bayer.com>; Bacon, Laura <Bacon.Laura@epa.gov>; Maratos, Marie - FSIS  
<Marie.Maratos@fsis.usda.gov>; 'Pat.Basu@fsis.usda.gov' <Pat.Basu@fsis.usda.gov>  
**Subject:** RE: Request for comments - CCPR eWG on IESTI:

Hi David,

Please find the Crop Life International commenting table for the IESTI eWG that we plan to submit. There have been numerous discussions within CLI and CLA to arrive at this composite document. The membership of CLA DAWG had the lead on this and it was agreed to provide these to you by your December 13<sup>th</sup> deadline. Several of us from CropLife on your team also welcome any addition discussion via a phone meeting if it is useful to you in putting together the US comments.

Regards,

**Cheryl Cleveland, Ph. D.**  
Global Consumer Safety

Phone: +1 919 547-2407, Mobile: +1-919-593-0194, Email: [cheryl.cleveland@basf.com](mailto:cheryl.cleveland@basf.com)

Postal Address: BASF Corporation, 26 Davis Drive, 27709-3528 Research Triangle Park, United States



**From:** Cheryl Cleveland  
**Sent:** Wednesday, December 07, 2016 12:03 PM  
**To:** David Miller ([miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)) <[miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)>  
**Cc:** Jane M Stewart <[jane.stewart@basf.com](mailto:jane.stewart@basf.com)>; 'jcranney@calcitrusquality.org' <[jcranney@calcitrusquality.org](mailto:jcranney@calcitrusquality.org)>; 'diana.haynes@ams.usda.gov' <[diana.haynes@ams.usda.gov](mailto:diana.haynes@ams.usda.gov)>; 'John.Johnston@fsis.usda.gov' <[John.Johnston@fsis.usda.gov](mailto:John.Johnston@fsis.usda.gov)>; 'Angela.S.Klemens@dupont.com' <[Angela.S.Klemens@dupont.com](mailto:Angela.S.Klemens@dupont.com)>; 'vincent.a.leopold@monsanto.com' <[vincent.a.leopold@monsanto.com](mailto:vincent.a.leopold@monsanto.com)>; 'kent.rupprecht@bayer.com' <[kent.rupprecht@bayer.com](mailto:kent.rupprecht@bayer.com)>; 'allen.scarborough@bayer.com' <[allen.scarborough@bayer.com](mailto:allen.scarborough@bayer.com)>; Jane M Stewart <[jane.stewart@basf.com](mailto:jane.stewart@basf.com)>; 'Bruce Young' <[bruce.young@bayer.com](mailto:bruce.young@bayer.com)>; Bacon, Laura <Bacon.Laura@epa.gov>; Maratos, Marie - FSIS <Marie.Maratos@fsis.usda.gov>; Pat.Basu@fsis.usda.gov  
**Subject:** RE: Request for comments - CCPR eWG on IESTI:

Hi David,

I had also signed up for your IESTI interest group, but somehow got dropped on this email (but not the others). . so thanks to Jane for ccing me.

What I can tell you is that CLI -Crop Life International (of which Crop Life America is a part) has been working on draft comments this week which will be finalized afternoon of Dec 12<sup>th</sup> – we plan to send them to you as FYI and that should meet your Dec 13<sup>th</sup> deadline. CLI has observer status in the eWG and we will submit one set of comments to the eWG at the CLI level.

If you desire any further discussion for alternate US only perspectives for your use, we would welcome a call with the membership of your list below if helpful to you.

Regards,

**Cheryl Cleveland, Ph. D.**  
Global Consumer Safety

Phone: +1 919 547-2407, Mobile: +1-919-593-0194, Email: [cheryl.cleveland@basf.com](mailto:cheryl.cleveland@basf.com)

Postal Address: BASF Corporation, 26 Davis Drive, 27709-3528 Research Triangle Park, United States



**From:** Jane M Stewart  
**Sent:** Wednesday, December 07, 2016 11:49 AM  
**To:** Cheryl Cleveland <[cheryl.cleveland@basf.com](mailto:cheryl.cleveland@basf.com)>  
**Cc:** David Miller ([miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)) <[miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)>  
**Subject:** FW: Request for comments - CCPR eWG on IESTI:

Hi David – we just noticed that Cheryl was missed on your e-mail, so I have forwarded it to her. She can update you on the compilation of CLA comments which we will share with you.

Thanks!

...Jane

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**Jane Stewart, PhD.**

Expert, Scientist

Environmental and Residue Sciences

BASF Corporation

Phone: +1 919 547-2273 Mobile: +1-973-641-2103 Fax: +1 919 547-2421 E-Mail: [jane.stewart@basf.com](mailto:jane.stewart@basf.com)  
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**From:** Miller, David [<mailto:Miller.DavidJ@epa.gov>]

**Sent:** Saturday, November 19, 2016 5:50 PM

**To:** [jcranney@calcitrusquality.org](mailto:jcranney@calcitrusquality.org); [diana.haynes@ams.usda.gov](mailto:diana.haynes@ams.usda.gov);  
[John.Johnston@fsis.usda.gov](mailto:John.Johnston@fsis.usda.gov); [Angela.S.Klemens@dupont.com](mailto:Angela.S.Klemens@dupont.com);  
[vincent.a.leopold@monsanto.com](mailto:vincent.a.leopold@monsanto.com); [kent.rupprecht@bayer.com](mailto:kent.rupprecht@bayer.com); [allen.scarborough@bayer.com](mailto:allen.scarborough@bayer.com);  
Jane M Stewart <[jane.stewart@basf.com](mailto:jane.stewart@basf.com)>; [bruce.young@bayer.com](mailto:bruce.young@bayer.com)

**Cc:** [Marie.Maratos@fsis.usda.gov](mailto:Marie.Maratos@fsis.usda.gov); [pat.basu@fsis.usda.gov](mailto:pat.basu@fsis.usda.gov); Bacon, Laura  
<[Bacon.Laura@epa.gov](mailto:Bacon.Laura@epa.gov)>

**Subject:** Request for comments - CCPR eWG on IESTI:

Dear U.S Interest Group for the CCPR eWG for IESTI:

Please find attached the materials provided by the NL and AUS co-chairs of the CCPR IESTI eWG and their email note to members of the CCPR IESTI eWG below. Note that the email note below and the accompanying instructions applies only to the U.S. government (USG) as a formal member of the eWG, so you should not be submitting separate or independent comments under the guise of the US Interest Group, but instead work through me, the U.S. delegate to CCPR, who will be submitting the single USG set of comments through formal channels. Nevertheless, the USG will certainly seek input from all of you in developing its comments and positions and we anticipate having a dialogue with all of you on this and

receiving feedback from you, and – ideally – the USG will be submitting comments on the attached draft document that are mutually acceptable to all of us.

Note that the timeline provided below by the eWG co-chairs is short, and USG comments need to be submitted to the co-chairs by **20 Dec 2016**. I anticipate beginning some preliminary internal discussions here next week between EPA and USDA (before Thanksgiving giving), and then have us reach out to all of you shortly after that during the week after Thanksgiving. As we are interested in receiving your thoughts and comments in developing/assembling the USG response/comments, we would like to receive any comments you have NLT COB 13 December 2016 so as to give the USG enough time to review and assemble these into one document for submission to the NL and AUS co-chairs. If you have these comments earlier and are able to send them in, that would be great and will ease our tasks here. Any comments you have should be send to me ([miller.davidj@epa.gov](mailto:miller.davidj@epa.gov)) with a cc: to USCO's Marie Maratos ([Marie.Maratos@fsis.usda.gov](mailto:Marie.Maratos@fsis.usda.gov) and the US alternate delegate Dr. Pat Basu ([pat.basu@fsis.usda.gov](mailto:pat.basu@fsis.usda.gov) with the subject field being as above ("Request for comments--CCPR eWG on IESTI").

I will also shortly send out the final list of members of the US Interest Group for the three CCPR eWGs (of with IESTI is one) This way, you can see who is on the U.S. Interest Group for the present IESTI eWG as well as the other two Interest Groups. But only individuals listed on the IESTI eWG are receiving the present email. For convenience, here is the list of names, affiliations, and contact numbers for the U.S. Interest Group for the IESTI:

Cranney, Jim	<a href="mailto:jcranney@calcitrusquality.org">jcranney@calcitrusquality.org</a>	CCQC	530 906.6546
Haynes, Diana	<a href="mailto:diana.haynes@ams.usda.gov">diana.haynes@ams.usda.gov</a>	USDA	202 572.8167
Johnston, John	<a href="mailto:John.Johnston@fsis.usda.gov">John.Johnston@fsis.usda.gov</a>	USDA	202 365.7175
Klemens, Angela	<a href="mailto:Angela.S.Klemens@dupont.com">Angela.S.Klemens@dupont.com</a>	Dupont	302 451.3360
Leopold, Vincent	<a href="mailto:vincent.a.leopold@monsanto.com">vincent.a.leopold@monsanto.com</a>	Monsanto	314 694.8031
Rupprecht, Kent	<a href="mailto:kent.rupprecht@bayer.com">kent.rupprecht@bayer.com</a>	Bayer	919-597-8339
Scarborough, Allen	<a href="mailto:allen.scarborough@bayer.com">allen.scarborough@bayer.com</a>	Bayer	919 414.5016
Stewart, Jane	<a href="mailto:jane.stewart@basf.com">jane.stewart@basf.com</a>	BASF	919 547.2273
Young, Bruce	<a href="mailto:bruce.young@bayer.com">bruce.young@bayer.com</a>	Bayer	919 549.2431

Regards,

David

---

David J. Miller   CAPT | USPHS

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and Acting Chief, Toxicology & Epidemiology Branch  
Health Effects Division  
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**From:** Bernadette Ossendorp [<mailto:bernadette.ossendorp@rivm.nl>] **On Behalf Of**  
[CCPR\\_IESTI@rivm.nl](mailto:CCPR_IESTI@rivm.nl)

**Sent:** Friday, November 18, 2016 11:09 AM

**To:** IESTI Participants WG <[IESTI\\_Participants\\_WG@rivm.nl](mailto:IESTI_Participants_WG@rivm.nl)>; IESTI Observers WG  
<[IESTI\\_Observers\\_WG@rivm.nl](mailto:IESTI_Observers_WG@rivm.nl)>

**Cc:** [mj.martena@minvws.nl](mailto:mj.martena@minvws.nl)

**Subject:** Request for comments - CCPR eWG on IESTI

**Dear members of the electronic Working Group on the impact of the possible revision of the current IESTI equations,**

Thank you for signing up to this electronic working group (eWG). Attached, you will find a draft Discussion paper for the next CCPR. The paper summarizes the discussions until now, and makes a start with addressing our Terms of Reference. The objective of the current eWG is, to improve on this draft Discussion paper in order to make it as clear and transparent as possible so that we can have an informed discussion at the next Session of CCPR.

For those of you who have not participated in a Codex eWG before, please refer to the Procedural Manual for the appropriate working procedures. <http://www.fao.org/fao-who-codexalimentarius/procedures-strategies/procedural-manual/en/> For convenience, I attach the part relevant to eWGs as a pdf, but please note that in this part there are references to other parts in the complete manual.

You receive this e-mail from a functional e-mail box that is especially dedicated to our eWG. Since we have quite a large number of participants (about 100 persons coming from 33 countries, the European Commission, and 14 observer organisations), we propose that we work by the following procedure:

- Please do not send in comments as an individual but collect your comments per country or observer group.
- Please use the commenting table as attached to provide your comments, indicating the line number in the pdf file to which your comment relates.
- Please send your reply to this e-mail address only, to: [CCPR\\_IESTI@rivm.nl](mailto:CCPR_IESTI@rivm.nl) (please note the underscore between 'CCPR' and 'IESTI'). Please do **NOT** use the option 'reply-to-all' when you send in your comments. We will collect all responses and bring them together in one document.
- In this document with the compiled comments, we will include our response to the comments. This document will be shared with the whole eWG, together with the updated draft Discussion paper.

Task	Deadline
First draft document distribution:	18 Nov 2016
Deadline for comments on the first draft document	20 Dec 2016
Compiled comments and response, and Second draft document circulated to members of eWG	12 Jan 2017
Deadline for comments on the second draft document. Please use this commenting round only for <b>insurmountable</b> comments.	20 Jan 2017
Final document sent to Codex Secretariat for editor review, translation and distribution as CCPR49 agenda item	30 Jan 2017

We realize that we have a very tight timetable. However, we believe that the discussions on the possible revision of the IESTI are only just beginning and that there will be sufficient time for everyone to give further input at a later stage.

A decision on the possibility of a physical working group to be held immediately prior to or during CCPR 49 will be made at a later date and a separate invitation to register will be issued if a pWG is to be held.

We look forward to a fruitful co-operation.

Kind regards, also on behalf of the Dutch Delegation and our Australian co-chairs



Bernadette Ossendorp

Dr. B.C. Ossendorp  
Head Dept. Food Safety  
RIVM/Centre for Nutrition, Prevention and Health Services (VPZ)  
PO Box 1, 3720 BA Bilthoven  
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Not available on Wednesdays

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